

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NAUTILUS INSURANCE  
COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER  
MURDAUGH, Sr., CORY FLEMING,  
MOSS & KUHN, P.A., CHAD  
WESTENDORF, and PALMETTO  
STATE BANK,

Defendants.

Case No. 2:22-cv-1307-RMG

**NAUTILUS INSURANCE  
COMPANY'S PRELIMINARY  
EXHIBIT LIST**

Nautilus Insurance Company ("Nautilus"), by and through its undersigned attorneys,  
hereby submits the following list of exhibits it intends to or may present at trial:

<b>No.</b>	<b>Description</b>	<b>Bates/Docket No. (if applicable)</b>
1	March 8, 2018 Letter from Cory Fleming regarding institution of wrongful death claim against Defendant Murdaugh	ECF No. 187-3
2	April 22, 2019 Letter from John Grantland to Cory Fleming enclosing check for \$3.8m from Nautilus and establishing conditions for depositing and releasing those funds from trust.	ECF No. 187-23
3	April 18, 2019 Nautilus check for \$3.8m	ECF No. 187-31
4	December 20, 2017 email to Cory Fleming from Forge Consultants	Ex. 7 to Fleming deposition
5	May 25, 2023 Transcript of Cory Fleming Federal Guilty Plea	ECF No. 187-1
6	December 13, 2018 Application and December 18, 2018 order Appointing successor PR	ECF No. 187-10
7	December 18, 2018 Fiduciary letter issued by Probate Court to Successor PR	ECF No. 187-14
8	December 19, 2018 Petition for Approval of Wrongful Death Settlement (Lloyd's)	ECF No. 187-15
9	November 28, 2018 Fleming emails regarding appointment of Chad Westendorf as successor PR	ECF No. 187-7

10	January 7, 2018 Disbursement Statement - Lloyd's – 475k	ECF No. 187-19
11	May 13, 2019 Disbursement Statement – Lloyd's 505k, Nautilus 3.8	ECF No. 187-27
12	September 30, 2021 Account ledger showing disbursements from M&K Trust Account	ECF No. 187-21
13	May 13, 2019 Signed, unfiled order approving settlement	ECF No. 187-24
14	September 30, 2020 Emails re clerk of court's Notice of Hearing re ADR Compliance for case 2018-CP-25-00505	ECF No. 187-29
15	October 6, 2020 Filed Stipulation of Dismissal for case 2018-CP-25-00505	ECF No. 187-30
16	March 25, 2019 Mediation agreement in re: claims of the estate of Gloria Satterfield	ECF No. 187-32
17	May 27, 2022 Confession of Judgment and Stipulation by RA Murdaugh in Satterfield suit, 2021-CP-25-00298	ECF No. 187-34
18	Fleming State Indictment	ECF No. 240-1
19	Fleming State Guilty Plea	ECF No. 240-2
20	March 28, 2018 - Probate court appointment of Michael Satterfield as PR for Estate of Gloria Satterfield	ECF No. 187-4
21	March 8, 2018 letter from Alex Murdaugh assistant to medical group re Gloria Satterfield medical records	ECF No. 187-5
22	Handwritten notes by C. Fleming on March 1, 2018 email re wrongful death Claim	CHF_00005
23	April 2, 2018 email from Murdaugh assistant to Fleming assistant re PR Appointment	CHF_00262-64
24	July 20, 2018 email from Fleming assistant to Murdaugh assistant attaching Satterfield Authorizations	CHF_00254-56
25	November 30, 2018 email from Fleming assistant to Lloyds'-appointed defense counsel requesting check made out to C. Westendorf	CHF_00001
26	January 14-15 email exchange between Fleming and Westendorf re filing of document pertaining to Lloyd's settlement	CHF_00288-89
27	February 14, 2019 emails between Fleming and Fleming assistant regarding collecting Satterfield medical records from Hampton	CHF_00207-09
28	March 27, 2019 email from A. Miller to J. Lasky regarding mediation	NAUTILUS_006377

29	February 22-25, 2019 email exchange between J. Grantland, A. Miller regarding mediation	PHELPS-000366–67
30	March 22-24, 2019 email exchange between A. Miller, K. Karam regarding mediation	PHELPS-000932
31	March 29, 2019 email from Fleming to Grantland regarding structured settlement	CHF_00327
32	March 30, 2019 email from Fleming to Grantland regarding structured settlement	CHF_00332-33
33	April 10, 2019 emails between Fleming and assistant regarding release	CHF_00162-63
34	April 25, 2019 email from Fleming requesting Judge Mullen hear petition to approve settlement	CHF_000003
35	May 6, 2019 emails between Fleming and Grantland regarding approval proceeding	CHF_000346, 00348
36	October 5, 2020 stipulation of dismissal of case number 2018-CP-25-00505 in Hampton County, South Carolina	n/a
37	October 6, 2020 emails between Fleming and assistant regarding disbursement of addition funds to Forge	CHF_00157-58
38	October 7, 2018 email between Moss & Kuhn personnel regarding delivery of checks from Fleming to Murdaugh	CHF_00038
39	Nautilus Claims Notes	NAUTILUS_002381-564
40	MKF cancelled check	PSB 000355 (Ex. 3 to M&K 30(b)(6) deposition)
41	MKF cancelled check	MOSS & KUHN 0068 (Ex. 4 to M&K 30(b)(6) deposition)
42	MKF cancelled check	BBT (9-27-2021)-001311 (Ex. 5 to M&K 30(b)(6) deposition)
43	November 6, 2018 letter from S. Wallinger to Brit, CJW with comprehensive report on claim by Murdaugh re Satterfield	M&G000092–118
44	November 12, 2018 letter from D. Rheney to A. Miller re Lloyds' tendering limits	M&G000121–23

Pursuant to Fed. R. Civ. P. 26(a)(3), this list does not include those exhibits which may be needed for impeachment. Plaintiff may introduce additional exhibits that were exhibits to depositions in this matter as well as any exhibit identified by Defendant, and reserves the right to do so and to supplement this list as appropriate.

**Respectfully submitted:**

**EPTING & RANNIK, LLC**

This 2nd day of December, 2024  
Charleston, South Carolina

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*ATTORNEYS FOR NAUTILUS INSURANCE  
COMPANY*